

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA

v.

IAN FREEMAN, ET AL

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No. 1:21-cr-00041-JL

**ASSENTED-TO MOTION FOR TRIAL DATE
AND RELATED DEADLINES**

The United States of America, by John J. Farley, Acting United States Attorney for the District of New Hampshire, moves this court to adopt the following trial date and dates relating thereto for this case. This Court held a status conference on November 22, 2022, and ordered the parties to submit a scheduling order by December 20, 2022. The government and counsel for the defendants have conferred and all parties have agreed upon the following trial schedule:

TRIAL	November 1, 2022 Motions to Continue Due by September 1, 2022
DISCOVERY EXCEPT GIGLIO OF TESTIFYING WITNESSES¹	April 25, 2022
EXCEPTION FOR GOOD CAUSE SHOWN, ANY NEW INDICTMENTS BASED ON CONDUCT KNOWN TO THE GOVERNMENT BY THAT DATE AND PART OF THE SAME COURSE OF CONDUCT IN THE CURRENT INDICTMENT	April 25, 2022

¹ Consistent with discovery obligations, any discovery generated after this date will continue to be produced as it is received by the Government.

DISCOVERY FROM DEFENSE	By Rule
WITNESS STATEMENTS/GIGLIO FOR TESTIFYING WITNESSES	By Rule
EXPERT WITNESSES - GOVT	May 13, 2022
EXPERT WITNESSES - DEF	September 1, 2022
404(b) EVIDENCE	By Rule
EXHIBITS AND WITNESS LISTS	By Rule
JERS STATEMENT	By Rule
DISPOSITIVE EVIDENTIARY MOTIONS	July 8, 2022 Government Response by August 3, 2022
IN LIMINE MOTIONS	October 14, 2022

The parties respectfully request that the Court adopt the these proposed deadlines in the above captioned case.

Respectfully submitted,

JOHN J. FARLEY
Acting United States Attorney

/s/ John J. Kennedy
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CERTIFICATION

I hereby certify that a copy of this motion was served electronically, through ECF, on all counsel of record in this case on December 20, 2021.

/s/ John J. Kennedy
Assistant U.S. Attorney